

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

JASON WILLIAMS,	X	
	:	
Plaintiff,	:	Case No. 5:19-cv-00475-BO
	:	
vs.	:	PLAINTIFF'S NOTICE OF REMOTE
	:	DEPOSITION OF F.R.C.P. 30(B)(6)
AT&T MOBILITY LLC,	:	CORPORATE DEPOSITION OF
	:	DEFENDANT AT&T MOBILITY LLC
Defendant.	:	

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Jason Williams will take, with regards to the matters set forth in the annexed Exhibit A, the testimony upon oral examination of Defendant AT&T Mobility LLC, via remote electronic means, commencing on Tuesday, October 26, 2021, at 10:00 a.m. The examination will be conducted through a web-based platform. Sullivan Group of Court Reporters provided the following video-conference details to access the deposition:

Join Zoom Meeting:

<https://us02web.zoom.us/j/83027015549?pwd=MHg3Rkg3SitlU1V4YmVNMXprZFdkQT09>

Meeting ID: 830 2701 5549

Passcode: 203186

The deposition will be conducted consistent with the Federal Rules of Civil Procedure. It will be taken before a Certified Shorthand Reporter authorized to administer oaths, and will be continued from day to day until completed, with weekends and legal holidays excepted.

PLEASE TAKE FURTHER NOTICE that the deposition may also be videotaped, audiotaped, and/or stenographically recorded through the instant visual display of testimony. Petitioner expressly reserves the right to introduce and use the stenographic transcript and/or

videotape of the deponent's deposition, or portions thereof, at the trial and other proceedings related to this matter.

Dated: New York, New York
October 1, 2021

WITHERS BERGMAN LLP

By: 

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Counsel for Defendant AT&T Mobility LLC

EXHIBIT A
TO NOTICE TO AT&T MOBILITY LLC, DATED OCTOBER 1, 2021
IDENTIFYING MATTERS ON WHICH DESIGNATED PERSONS WILL TESTIFY

I. DEFINITIONS AND RULES OF CONSTRUCTION

1. “You” or “Your” or “AT&T” means Defendant AT&T Mobility LLC, and each of its present and former parents, subsidiaries, affiliates, franchisees, Authorized Retailers, agents, employees, contractors, attorneys, attorneys-in-fact, accountants, representatives, successors or assigns, and every other person or entity acting on its behalf.

2. “Claims” refers to all claims asserted in Plaintiff’s Complaint.

3. “Concerning” means relating to, referring to, describing, evidencing or constituting.

4. “SIM Swap” and/or “SIM Swapping” means unauthorized and illegitimate SIM Card changes, as described in the Complaint, and includes attempted, alleged, or potentially unauthorized and illegitimate SIM Card changes.

5. “Williams Account(s)” means any AT&T telephone and/or data account purchased by, created by, created for, provide to, or otherwise associated with Plaintiff.

6. “Prime Communications, L.P.” or “Prime” means the entity identified in Your Initial Disclosures.

7. “Alorica, Inc.” or “Alorica” means the entity identified in Your Initial Disclosures.

8. “Convergys Customer Management Group Inc. n/k/a Concentrix Corporation” or “Concentrix” means the entity identified in Your Initial Disclosures.

9. “TPUSA, Inc.” or “Teleperformance” means the entity identified in Your Initial Disclosures.

10. The use of the singular form of any word includes the plural and vice versa.
11. The relevant time period for all matters below is January 1, 2018 to the present.

II. MATTERS FOR EXAMINATION

1. AT&T's knowledge Concerning the Claims.
2. AT&T's knowledge Concerning the Williams Account(s), including any notes associated with the Williams Account(s).
3. AT&T's knowledge Concerning SIM Swapping of AT&T's users, customers, and/or clients.
4. AT&T's knowledge Concerning AT&T's obligations under and compliance with the 2015 Consent Decree and related Federal Communications Commission enforcement action as set forth in Plaintiff's Complaint at, for example, paragraphs 140-143.
5. AT&T's business relationships with Prime, Alorica, Teleperformance, and Concentrix.